

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

MATTHEW C. ZORN,

*Plaintiff,*

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

*Defendants.*

Civil Action No. 4:22-CV-02396

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO FILE  
REPLY IN SUPPORT OF CROSS-MOTION FOR SUMMARY  
JUDGMENT**

Defendants U.S. Department of Justice, *et al.*, respectfully move for a seven-day extension of the deadline to file Defendants' reply in support of Defendants' cross-motion for summary judgment in this case. The current deadline is December 16, 2024. ECF No. 107. Defendants seek an extension until December 23, 2024. Counsel for Defendants conferred with Plaintiff who stated that he does not oppose the requested extension.

Good cause supports this Motion. Under the briefing schedule initially entered by the Court, Defendants had 26 days to draft Defendants' reply brief. Due to subsequent changes to the schedule, that time has shortened to 14 days. Moreover, the undersigned counsel for Defendants is contending with several other upcoming deadlines in other lawsuits, including depositions in the final weeks of a period of expedited discovery. Accordingly, additional time will be necessary to prepare the reply.

For these reasons, Defendants respectfully seek a seven-day extension of time until December 23, 2024 to file Defendants' summary judgment reply.

DATED: December 11, 2024

Respectfully Submitted,

s/Jimmy A. Rodriguez  
Jimmy A. Rodriguez  
Assistant United States Attorney  
Southern District of Texas  
Attorney in Charge  
Texas Bar No. 24037378  
Federal ID No. 572175  
1000 Louisiana, Suite 2300  
Houston, Texas 77002  
Tel: (713) 567-9532  
Fax: (713) 718-3303  
[jimmy.rodriguez2@usdoj.gov](mailto:jimmy.rodriguez2@usdoj.gov)

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director

s/Joshua Kolsky  
Joshua M. Kolsky  
Senior Trial Counsel  
Civil Division, Federal Programs Branch  
U.S. Department of Justice  
Texas Bar No. 24092989  
1100 L Street, NW  
Washington, DC 20005  
Tel: (202) 305-7664  
[joshua.kolsky@usdoj.gov](mailto:joshua.kolsky@usdoj.gov)

Attorneys for Defendants

**CERTIFICATE OF CONFERENCE**

Defendants have conferred with Plaintiff about this motion and Plaintiff is not opposed.

s/ Joshua Kolsky  
Joshua Kolsky  
Senior Trial Counsel

**CERTIFICATE OF SERVICE**

I certify that on December 11, 2024, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Joshua Kolsky  
Joshua Kolsky  
Senior Trial Counsel